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52-3 JUDICIAL DISTRICT  
JUDICIAL CIRCUIT  
COUNTY PROBATE

## SUMMONS AND COMPLAINT

CASE NO.

14-C01685

Court address

Court telephone no.

52-3 DISTRICT COURT 700 BARCLAY CIRCLE ROCHESTER MI 48307

(248) 853-5553

Plaintiff's name(s), address(es), and telephone no(s).

Paul Tatscos & Eija Tatscos  
905 Buckhorn Dr.  
Lake Orion MI 48362

v

Defendant's name(s), address(es), and telephone no(s).

CSC-Lawyers Incorporating Service  
Registered Agent for Equifax Information Services, LLC  
601 Abbott Road  
East Lansing, MI 48823

Plaintiff's attorney, bar no., address, and telephone no.

Equifax Information Services, LLC  
PO Box 105069  
Atlanta, GA 30348**SUMMONS** NOTICE TO THE DEFENDANT: In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. YOU HAVE 21 DAYS after receiving this summons to file a written answer with the court and serve a copy on the other party or take other lawful action with the court (28 days if you were served by mail or you were served outside this state). (MCR 2.111(C))
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.

Issued

04/09/14

This summons expires

07/09/14

Court Clerk

RENEE S. GILLERT

cm88

\*This summons is invalid unless served on or before its expiration date.

This document must be sealed by the seal of the court.

**COMPLAINT** Instruction: The following is information that is required to be in the caption of every complaint and is to be completed by the plaintiff. Actual allegations and the claim for relief must be stated on additional complaint pages and attached to this form.

## Family Division Cases

- ☐ There is no other pending or resolved action within the jurisdiction of the family division of circuit court involving the family or family members of the parties.
- ☐ An action within the jurisdiction of the family division of the circuit court involving the family or family members of the parties has been previously filed in

The action ☐ remains ☐ is no longer pending. The docket number and the judge assigned to the action are:

Docket no.	Judge	Bar no.
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## General Civil Cases

- ☒ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has been previously filed in

The action ☐ remains ☐ is no longer pending. The docket number and the judge assigned to the action are:

Docket no.	Judge	Bar no.
	CASE ASSIGNED TO (P42708) JUDGE LISA L. ASADOORIAN	

**VENUE**

Plaintiff(s) residence (include city, township, or village) Lake Orion, Oakland County, Michigan	Defendant(s) residence (include city, township, or village) Atlanta, Fulton County, Georgia
Place where action arose or business conducted Oakland County, Michigan Lake Orion	

04/07/2014

Date

Signature of attorney/plaintiff

If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

MC 01 (3/08) SUMMONS AND COMPLAINT MCR 2.102(B)(11), MCR 2.104, MCR 2.105, MCR 2.107, MCR 2.113(C)(2)(a), (b), MCR 3.206(A)

Def.

**PROOF OF SERVICE****SUMMONS AND COMPLAINT**

Case No. \_\_\_\_\_

**TO PROCESS SERVER:** You are to serve the summons and complaint not later than 91 days from the date of filing or the date of expiration on the order for second summons. You must make and file your return with the court clerk. If you are unable to complete service you must return this original and all copies to the court clerk.

**CERTIFICATE/AFFIDAVIT OF SERVICE/NONSERVICE**☐ **OFFICER CERTIFICATE**

I certify that I am a sheriff, deputy sheriff, bailiff, appointed court officer, or attorney for a party (MCR 2.104[A][2]), and that: (notarization not required)

OR

☐ **AFFIDAVIT OF PROCESS SERVER**

Being first duly sworn, I state that I am a legally competent adult who is not a party or an officer of a corporate party, and that: (notarization required)

- ☐ I served personally a copy of the summons and complaint,  
☐ I served by registered or certified mail (copy of return receipt attached) a copy of the summons and complaint,  
 together with \_\_\_\_\_

List all documents served with the Summons and Complaint

\_\_\_\_\_

\_\_\_\_\_ on the defendant(s):

Defendant's name	Complete address(es) of service	Day, date, time

- ☐ I have personally attempted to serve the summons and complaint, together with any attachments, on the following defendant(s) and have been unable to complete service.

Defendant's name	Complete address(es) of service	Day, date, time

I declare that the statements above are true to the best of my information, knowledge, and belief.

Service fee	Miles traveled	Mileage fee	Total fee
\$		\$	\$

Signature \_\_\_\_\_

Name (type or print) \_\_\_\_\_

Title \_\_\_\_\_

Subscribed and sworn to before me on \_\_\_\_\_ Date \_\_\_\_\_ County, Michigan.

My commission expires: \_\_\_\_\_ Date \_\_\_\_\_ Signature: \_\_\_\_\_  
 Deputy court clerk/Notary public

Notary public, State of Michigan, County of \_\_\_\_\_

**ACKNOWLEDGMENT OF SERVICE**

I acknowledge that I have received service of the summons and complaint, together with \_\_\_\_\_

Attachments \_\_\_\_\_

\_\_\_\_\_ on

Day, date, time

on behalf of \_\_\_\_\_

Signature \_\_\_\_\_

STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT 52-3DC	COMPLAINT	CASE NO. 14-_____
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Court address:

52-3 DISTRICT COURT 700 BARCLAY CIRCLE ROCHESTER MI 48307

Court telephone no.

(248) 853-5553

Plaintiff name(s) and address(es)

Paul Tatseos & Eija Tatseos  
905 Buckhorn Dr.  
Lake Orion MI 48362

v

Defendant name(s) and address(es)

CSC-Lawyers Incorporating Service  
Registered Agent for Equifax Information Services, LLC  
601 Abbott Road  
East Lansing, MI 48823

Equifax Information Services, LLC  
PO Box 105069  
Atlanta, GA 30348

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COMPLAINT

NOW COME the above named Plaintiffs, Paul Tatseos and Eija Tatseos, pro se, and

for its Complaint states as follows:

This is a civil action whereby Plaintiff seeks Preliminary and Permanent Injunctive Relief enjoining Defendant, Equifax Information Services, LLC, from engaging in further violations of the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq.

An actual controversy exists between the parties, in that the challenged actions of the Defendant has caused and will continue to cause the Plaintiffs substantial harm unless the requested relief is granted.

INTRODUCTION

1. Plaintiffs submitted written disputes of several items contained in Plaintiffs' files held and maintained by Defendant pursuant to 15 U.S.C. § 1681 (i)(a)(1)(A).
2. Defendant did not "conduct a reasonable reinvestigation" into Plaintiffs' disputes, pursuant to 15 U.S.C. § 1681 (i)(a)(1)(A), rather relied on their "eOscar" computer system to report inaccurate information.

STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT 52-3DC	COMPLAINT	CASE NO. 14- _____
Court address: 52-3 DISTRICT COURT 700 BARCLAY CIRCLE ROCHESTER MI 48307		Court telephone no: (248) 853-5553
Plaintiff name(s) and address(es) Paul Tatseos & Elja Tatseos 905 Buckhorn Dr. Lake Orion MI 48362	v	Defendant name(s) and address(es) CSC-Lawyers Incorporating Service Registered Agent for Equifax Information Services, LLC 601 Abbott Road East Lansing, MI 48823  Equifax Information Services, LLC PO Box 105069 Atlanta, GA 30348

3. Plaintiffs submitted several "Method of Verification" requests, pursuant to 15 U.S.C. § 1681 (i)(a)(7) and "Intent to Sue" letters to Defendant upon receipt of reinvestigation results.
4. Defendant demonstrated willful noncompliance by not responding to any of Plaintiffs' "Method of Verification" requests, and by not providing the information pursuant to 15 U.S.C. § 1681 (i)(a)(6)(B)(iii).
5. Copies of Plaintiffs' letters referenced in paragraphs 1 and 3 can be found in Exhibit 1. US Postal Service Certified Mail Return Receipt indicating proof of receipt by Defendant of Plaintiffs' letters referenced in paragraphs 1 and 3 can be found in Exhibit 2. In both Exhibits, relevant paragraphs for the scanned documents are indicated in bold on the top of the document.

#### JURISDICTION AND VENUE

6. Jurisdiction of this court arises under 15 U.S.C. § 1681p.
7. Declaratory relief is available pursuant to 28 U.S.C. §§ 2201 and 2202.
8. Venue is proper, because many of the relevant events occurred within Oakland County in the State of Michigan.

STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT 52-3DC	COMPLAINT	CASE NO. 14-_____
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Court address:

52-3-DISTRICT COURT 700 BARCLAY CIRCLE ROCHESTER MI 48307

Court telephone no:

(248) 853-5553

Plaintiff name(s) and address(es) Paul Tatseos & Eija Tatseos 905 Buckhorn Dr. Lake Orion MI 48362	v	Defendant name(s) and address(es) CSC-Lawyers Incorporating Service Registered Agent for Equifax Information Services, LLC 601 Abbott Road East Lansing, MI 48823  Equifax Information Services, LLC PO Box 105069 Atlanta, GA 30348
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**PARTIES**

9. Plaintiffs are Paul Tatseos and Eija Tatseos.

10. Plaintiffs are consumers as defined in 15 U.S.C. § 1681 (a)(c).

11. Defendant is Equifax Information Services, LLC.

12. Defendant a "Consumer Reporting Agency" as defined in 15 U.S.C. § 1681 (a)(b) and 15

U.S.C. § 1681 (a)(f).

**FACTS****Facts Common to All Counts**

13. The Plaintiffs reside in Lake Orion, Oakland County, Michigan.

14. Plaintiffs' consumer reports are as defined by 15 U.S.C. § 1681 (a)(d), et seq.

**Disputes of Inaccurate Information – Paul Tatseos**

15. On September 24, 2013, Paul Tatseos sent a letter Certified Mail, Return Receipt

Requested (hereinafter "CMRRR") to Defendant disputing an item of information on his

consumer report for Accurate Account Solutions account 53647060279.

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<b>STATE OF MICHIGAN</b> <b>JUDICIAL DISTRICT</b> <b>JUDICIAL CIRCUIT</b> <b>52-3DC</b>	<b>COMPLAINT</b>	<b>CASE NO.</b> <b>14- _____</b>
<b>Court address</b> <b>52-3 DISTRICT COURT 700 BARCLAY CIRCLE ROCHESTER MI 48307</b>		<b>Court telephone no:</b> <b>(248) 853-5553</b>
<b>Plaintiff name(s) and address(es)</b> <b>Paul Tatseos &amp; Eija Tatseos</b> <b>905 Buckhorn Dr.</b> <b>Lake Orion MI 48362</b>	<b>v</b>	<b>Defendant name(s) and address(es)</b> <b>CSC-Lawyers Incorporating Service</b> <b>Registered Agent For Equifax Information Services, LLC</b> <b>601 Abbott Road</b> <b>East Lansing, MI 48823</b>  <b>Equifax Information Services, LLC</b> <b>PO Box 105069</b> <b>Atlanta, GA 30348</b>

16. On October 23, 2013, Defendant reported *Accurate Account Solutions* account 53647060279 on Paul Tatseos' consumer report as verified, but did not conduct a reasonable reinvestigation, rather relied on their "eOscar" computer system to perpetuate inaccurate information.
17. On November 12, 2013, Paul Tatseos sent a letter CMRRR to Defendant disputing items of information on his consumer report for *Capital One* account 4003447013470531, *Charter One* account 5240380004080623 and *US Bank* account 4190087706438354.
18. On December 2, 2013, Defendant reported *Capital One* account 4003447013470531, *Charter One* account 5240380004080623 and *US Bank* account 4190087706438354 on Paul Tatseos' consumer report as verified, but did not conduct a reasonable reinvestigation, rather relied on their "eOscar" computer system to perpetuate inaccurate information.
19. On December 17, 2013, Paul Tatseos sent a letter CMRRR to Defendant disputing items of information on his consumer report for *Ally Financial* account 045913929530, *HSBC Bank* account 5472048962 and *Oakland County* 52 District docket numbers 11C03090GC, 11C02769GC and 9C06199GC.

<b>STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT 52-3DC</b>	<b>COMPLAINT</b>	<b>CASE NO. 14-_____</b>
<b>Court address</b> 52-3 DISTRICT COURT 700 BARCLAY CIRCLE ROCHESTER MI 48307		<b>Court telephone no:</b> (248) 853-5553
<b>Plaintiff name(s) and address(es)</b> Paul Tatseos & Eija Tatseos 905 Buckhorn Dr. Lake Orion MI 48362	<b>v</b>	<b>Defendant name(s) and address(es)</b> CSC-Lawyers Incorporating Service Registered Agent for Equifax Information Services, LLC 601 Abbott Road East Lansing, MI 48823  Equifax Information Services, LLC PO Box 105069 Atlanta, GA 30348

20. On January 15, 2013, Defendant reported *Ally Financial account 045913929530, HSBC Bank account 5472048962 and Oakland County 52 District docket number 11C02769GC* on Paul Tatseos' consumer report as verified, but did not conduct a reasonable reinvestigation, rather relied on their "eOscar" computer system to perpetuate inaccurate information.

Disputes of Inaccurate Information – Eija Tatseos

21. On October 29, 2013, Eija Tatseos sent a letter CMRRR to Defendant disputing items of information on her consumer report for *HSBC Bank account 601138002800xxxx, NCA account 601138002800xxxx and Senex Services account D3071782N1*.
22. On November 23, 2013, Defendant reported *HSBC Bank account 601138002800xxxx, NCA account 601138002800xxxx and Senex Services account D3071782N1* on Eija Tatseos' consumer report as verified, but did not conduct a reasonable reinvestigation, rather relied on their "eOscar" computer system to perpetuate inaccurate information.
23. On December 17, 2013, Eija Tatseos sent a letter CMRRR to Defendant disputing items of information on her consumer report for *Chase Bank USA NA account 5483109201359787,*

STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT 52-3DC	COMPLAINT	CASE NO. 14-_____
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Court address

52-3 DISTRICT COURT 700 BARCLAY CIRCLE ROCHESTER MI 48307

Court telephone no.

(248) 853-5553

Plaintiff name(s) and address(es) Paul Tatseos & Eija Tatseos 905 Buckhorn Dr. Lake Orion MI 48362	v.	Defendant name(s) and address(es) CSC-Lawyers Incorporating Service Registered Agent for Equifax Information Services, LLC 601 Abbott Road East Lansing, MI 48823  Equifax Information Services, LLC PO Box 105069 Atlanta, GA 30348
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*HSBC Bank account 473068012801xxxx, and Oakland County 52 District docket numbers*

*09C06199GC and 13C00129GC.*

24. On January 16, 2013, Defendant reported Chase Bank USA NA account

*5483109201359787, HSBC Bank account 473068012801xxxx, and Oakland County 52*

*District docket numbers 09C06199GC and 13C00129GC on Eija Tatseos' consumer report*

*as verified, but did not conduct a reasonable reinvestigation, rather relied on their*

*"eOscar" computer system to perpetuate inaccurate information.*

"Method of Verification" Requests

25. On December 17, 2013, Paul Tatseos sent a letter CMRRR to Defendant requesting

*"Method of Verification" pursuant to 15 U.S.C. § 1681 (i)(a)(7) and 15 U.S.C. § 1681*

*(i)(a)(6)(B)(iii) for Accurate Account Solutions account 53647060279, Capital One account*

*4003447013470531, Charter One account 5240380004080623, and US Bank account*

*4190087706438354.*

26. On December 17, 2013, Eija Tatseos sent a letter CMRRR to Defendant requesting

*"Method of Verification" pursuant to 15 U.S.C. § 1681 (i)(a)(7) and 15 U.S.C. § 1681*

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<b>STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT 52-3DC</b>	<b>COMPLAINT</b>	<b>CASE NO. 14-_____</b>
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Court address

52-3 DISTRICT COURT 700 BARCLAY CIRCLE ROCHESTER MI. 48307

Court telephone no.

(248) 853-5553

<b>Plaintiff name(s) and address(es)</b> Paul Tatseos & Eija Tatseos 905 Buckhorn Dr. Lake Orion MI 48362	<b>v.</b>	<b>Defendant name(s) and address(es)</b> CSC-Lawyers Incorporating Service Registered Agent for Equifax Information Services, LLC 601 Abbott Road East Lansing, MI 48823  Equifax Information Services, LLC PO Box 105069 Atlanta, GA 30348
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(i)(a)(6)(B)(iii) for HSBC Bank account 601138002800xxxx, NEA account 601138002800xxxx and Senex Services account D3071782N1.

27. On February 4, 2014, Paul Tatseos sent a letter CMRRR to Defendant with a second request for "Method of Verification" for Accurate Account Solutions account 53647060279, Capital One account 4003447013470531, Charter One account 5240380004080623, and US Bank account 4190087706438354, an initial "Method of Verification" request for Ally Financial account 045913929530, HSBC Bank account 5472048962 and Oakland County 52 District docket number 11C02769GC; and a notification of potential legal action for willful non-compliance of the Fair Credit Reporting Act, 15 U.S.C. § 1681.

28. On February 4, 2014, Eija Tatseos sent a letter CMRRR to Defendant requesting "Method of Verification" pursuant to 15 U.S.C. § 1681 (i)(a)(7) and 15 U.S.C. § 1681 (i)(a)(6)(B)(iii) for Chase Bank USA NA account 5483109201359787, HSBC Bank account 473068012801xxxx, and Oakland County 52 District docket numbers 09C06199GC and 13C00129GC.

<b>STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT 52-3DC</b>	<b>COMPLAINT</b>	<b>CASE NO.</b> <b>14-_____</b>
<b>Court address</b> <b>52-3 DISTRICT COURT 700 BARCLAY CIRCLE ROCHESTER MI 48307</b>		<b>Court telephone no.</b> <b>(248) 853-5553</b>
<b>Plaintiff name(s) and address(es)</b> <b>Paul Tatseos &amp; Eija Tatseos</b> <b>905 Buckhorn Dr.</b> <b>Lake Orion MI 48362</b>	<b>v</b>	<b>Defendant name(s) and address(es)</b> <b>CSC Lawyers Incorporating Service</b> <b>Registered Agent for Equifax Information Services, LLC</b> <b>601 Abbott Road</b> <b>East Lansing, MI 48823</b>  <b>Equifax Information Services, LLC</b> <b>PO Box 105069</b> <b>Atlanta, GA 30348</b>

29. As of the date of this complaint, Defendant has not responded to any requests for either Plaintiff referenced in paragraphs 25-28 for "Method of Verification" pursuant to 15 U.S.C. § 1681 (i)(a)(7) and 15 U.S.C. § 1681 (i)(a)(6)(B)(iii).

**COUNT I – VIOLATION OF 15 U.S.C. § 1681 (i)(a)(1)(A)**

30. Plaintiffs restate and re-allege all above paragraphs herein.

31. On October 23, 2013, Defendant did not conduct a reasonable reinvestigation prior to reporting *Accurate Account Solutions account 53647060279* on Paul Tatseos' consumer report as verified.

32. On December 2, 2013, Defendant did not conduct a reasonable reinvestigation prior to reporting *Capital One account 4003447013470531* on Paul Tatseos' consumer report as verified.

33. On December 2, 2013, Defendant did not conduct a reasonable reinvestigation prior to reporting *Charter One account 5240380004080623* on Paul Tatseos' consumer report as verified.

STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT 52-3DC	COMPLAINT	CASE NO. 14-_____
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Court address:  
52-3 DISTRICT COURT 700 BARCLAY CIRCLE ROCHESTER MI 48307

Court telephone no:  
(248) 853-5553

<b>Plaintiff name(s) and address(es):</b> Paul Tatseos & Eija Tatseos 905 Buckhorn Dr. Lake Orion MI 48362	v	<b>Defendant name(s) and address(es):</b> CSC-Lawyers Incorporating Service Registered Agent for Equifax Information Services, LLC 601 Abbott Road East Lansing, MI 48823  Equifax Information Services, LLC PO Box 105069 Atlanta, GA 30348
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34. On December 2, 2013, Defendant did not conduct a reasonable reinvestigation prior to reporting *US Bank account 4190087706438354* on Paul Tatseos' consumer report as verified.
35. On January 15, 2013, Defendant did not conduct a reasonable reinvestigation prior to reporting *Ally Financial account 045913929530* on Paul Tatseos' consumer report as verified.
36. On January 15, 2013, Defendant did not conduct a reasonable reinvestigation prior to reporting *HSBC Bank account 5472048962* on Paul Tatseos' consumer report as verified.
37. On January 15, 2013, Defendant did not conduct a reasonable reinvestigation prior to reporting *Oakland County 52 District docket number 11C02769GC* on Paul Tatseos' consumer report as verified.
38. On November 23, 2013, Defendant did not conduct a reasonable reinvestigation prior to reporting *HSBC Bank account 601138002800xxxx* on Eija Tatseos' consumer report as verified.
39. On November 23, 2013, Defendant did not conduct a reasonable reinvestigation prior to reporting *NCA account 601138002800xxxx* on Eija Tatseos' consumer report as verified.

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STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT 52-3DC	COMPLAINT	CASE NO. 14-_____
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Court address:

52-3 DISTRICT COURT 700 BARCLAY CIRCLE ROCHESTER MI 48307

Court telephone no.:

(248) 853-5553

<b>Plaintiff name(s) and address(es)</b> Paul Tatseos & Elja Tatseos 905 Buckhorn Dr. Lake Orion MI 48362	v	<b>Defendant name(s) and address(es)</b> CSC-Lawyers-Incorporating Service Registered Agent for Equifax Information Services, LLC 601 Abbott Road East Lansing, MI 48823  Equifax Information Services, LLC PO Box 105069 Atlanta, GA 30348
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40. On November 23, 2013, Defendant did not conduct a reasonable reinvestigation prior to reporting *Senex Services account D3071782N1* on Eija Tatseos' consumer report as verified.

41. On January 16, 2013, Defendant did not conduct a reasonable reinvestigation prior to reporting *Chase Bank USA NA account 5483109201359787* on Eija Tatseos' consumer report as verified.

42. On January 16, 2013, Defendant did not conduct a reasonable reinvestigation prior to reporting *HSBC Bank account 473068012801xxx* on Eija Tatseos' consumer report as verified.

43. On January 16, 2013, Defendant did not conduct a reasonable reinvestigation prior to reporting *Oakland County 52 District docket number 09C06199GC* on Eija Tatseos' consumer report as verified.

44. On January 16, 2013, Defendant did not conduct a reasonable reinvestigation prior to reporting *Oakland County 52 District docket number 13C00129GC* on Eija Tatseos' consumer report as verified.

STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT 52-3DC	COMPLAINT	CASE NO. 14-_____
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Court address:

52-3 DISTRICT COURT 700 BARCLAY CIRCLE ROCHESTER MI 48307

Court telephone no:

(248) 853-5553

Plaintiff name(s) and address(es) Paul Tatseos & Eija Tatseos 905 Buckhorn Dr. Lake Orion MI 48362	v.	Defendant name(s) and address(es) CSC Lawyers Incorporating Service Registered Agent for Equifax Information Services, LLC 601 Abbott Road East Lansing, MI 48823  Equifax Information Services, LLC PO Box 105069 Atlanta, GA 30348
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**COUNT II – VIOLATION OF 15 U.S.C. §§ 1681 (i)(a)(7) and (i)(a)(6)(B)(iii)**

45. Plaintiffs restate and re-allege all above paragraphs herein.
46. Defendant has not responded to Paul Tatseos' December 17, 2013 request for "Method of Verification" for *Accurate Account Solutions* account 53647060279.
47. Defendant has not responded to Paul Tatseos' December 17, 2013 request for "Method of Verification" for *Capital One* account 4003447013470531.
48. Defendant has not responded to Paul Tatseos' December 17, 2013 request for "Method of Verification" for *Charter One* account 5240380004080623.
49. Defendant has not responded to Paul Tatseos' December 17, 2013 request for "Method of Verification" for *US Bank* account 4190087706438354.
50. Defendant has not responded to Eija Tatseos' December 17, 2013 request for "Method of Verification" for *HSBC Bank* account 601138002800xxxx.
51. Defendant has not responded to Eija Tatseos' December 17, 2013 request for "Method of Verification" for *NCA* account 601138002800xxxx.
52. Defendant has not responded to Eija Tatseos' December 17, 2013 request for "Method of Verification" for *Senex Services* account D3071782N1.



<b>STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT 52-3DC</b>	<b>COMPLAINT</b>	<b>CASE NO. 14-_____</b>
Court address <b>52-3 DISTRICT COURT 700 BARCLAY CIRCLE ROCHESTER MI 48307</b>		Court telephone no. <b>(248) 853-5553</b>
<b>Plaintiff name(s) and address(es)</b> Paul Tatseos & Eija Tatseos 905 Buckhorn Dr. Lake Orion MI 48362	<b>v</b>	<b>Defendant name(s) and address(es)</b> CSC-Lawyers Incorporating Service Registered Agent for Equifax Information Services, LLC 601 Abbott Road East Lansing, MI 48823  Equifax Information Services, LLC PO Box 105069 Atlanta, GA 30348

53. Defendant has not responded to Paul Tatseos' February 4, 2014 request for "Method of Verification" for *Ally Financial account 045913929530*.
54. Defendant has not responded to Paul Tatseos' February 4, 2014 request for "Method of Verification" for *HSBC Bank account 5472048962*.
55. Defendant has not responded to Paul Tatseos' February 4, 2014 request for "Method of Verification" for *Oakland County 52 District docket number 11C02769GC*.
56. Defendant has not responded to Eija Tatseos' February 4, 2014 request for "Method of Verification" for *Chase Bank USA NA account 5483109201359787*.
57. Defendant has not responded to Eija Tatseos' February 4, 2014 request for "Method of Verification" for *HSBC Bank account 473068012801xxxx*.
58. Defendant has not responded to Eija Tatseos' February 4, 2014 request for "Method of Verification" for *Oakland County 52 District docket number 09C06199GC*.
59. Defendant has not responded to Eija Tatseos' February 4, 2014 request for "Method of Verification" for *Oakland County 52 District docket number 13C00129GC*.

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<b>STATE OF MICHIGAN</b> <b>JUDICIAL DISTRICT</b> <b>JUDICIAL CIRCUIT</b> <b>52-3DC</b>	<b>COMPLAINT</b>	<b>CASE NO.</b> <b>14-_____</b>
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Court address

52-3 DISTRICT COURT 700 BARCLAY CIRCLE ROCHESTER MI 48307

Court telephone no.

(248) 853-5553

<i>Plaintiff name(s) and address(es)</i> Paul Tatseos & Eija Tatseos 905 Buckhorn Dr. Lake Orion MI 48362	<b>v</b>	<i>Defendant name(s) and address(es)</i> CSC-Lawyers Incorporating Service Registered Agent for Equifax Information Services, LLC 601 Abbott Road East Lansing, MI 48823  Equifax Information Services, LLC PO Box 105069 Atlanta, GA 30348
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**CLAIM FOR RELIEF**

WHEREFORE, the Plaintiffs Paul Tatseos and Eija Tatseos, request that this Court enter judgment in its favor and against Defendant in the amount of:

- a) Statutory damages as provided by 15 U.S.C. §§ 1681 et seq. for each of the 14 violations of 15 U.S.C. § 1681 (i)(a)(1)(A) as described in Count I.
- b) Statutory damages as provided by 15 U.S.C. §§ 1681 et seq. for each of the 14 violations of 15 U.S.C. §§ 1681 (i)(a)(7) and (i)(a)(6)(B)(iii) as described in Count II.
- c) Punative damages as provided by 15 U.S.C. §§ 1681 et seq. as this Court may deem just and proper.
- d) Defendant's actual costs of this action, including but not limited to court filing fees to be determined at filing time, and US Postal Service fees in the amount of \$49.64.
- e) Injunctive relief as provided by 15 U.S.C. §§ 1681 et seq. by ordering removal of inaccurate information from Plaintiffs' consumer reports.
- f) Any and all other relief as the Court may deem just and proper.

<b>STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT 52-3DC</b>	<b>COMPLAINT</b>	<b>CASE NO.</b> <b>14-</b> _____
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Court address

52-3 DISTRICT COURT 700 BARCLAY CIRCLE ROCHESTER MI 48307

Court telephone no.

(248) 853-5553

<i>Plaintiff name(s) and address(es)</i> Paul Tatseos & Eija Tatseos 905 Buckhorn Dr. Lake Orion MI 48362	<b>v</b>	<i>Defendant name(s) and address(es)</i> CSC-Lawyers Incorporating Service Registered Agent for Equifax Information Services, LLC 601 Abbott Road East Lansing, MI 48823  Equifax Information Services, LLC PO Box 105069 Atlanta, GA 30348
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Respectfully submitted




Paul E Tatseos  
 Eija K Tatseos  
 248-408-8484  
 905 Buckhorn Drive  
 Lake Orion, MI 48362

April 7, 2014

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 52-3 DISTRICT COURT  
 2014 APR - 9 P 2:30

## **Exhibit 1 – Plaintiffs' Letters**

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52-3 DISTRICT COURT  
2014 APR -9 P 2:30

Paul Tatseos  
905 Buckhorn Dr.  
Lake Orion, MI 48362  
Re: Credit Report No. 334061130  
Certified Mail #7012 3050 0000 0788 1695

**P15**

September 24, 2013

Equifax Information Services, LLC  
PO Box 740256  
Atlanta, GA 30374

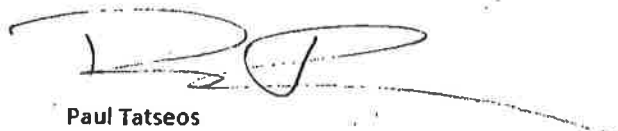
Dear Sir or Madam:

I am writing to dispute the following trade lines on my credit report:

- JP Morgan Chase Bank, account number 412540014312, the entries marked "30 Days Late" for September 2009 and October 2009 are reported incorrectly. These payments were made on time. I am requesting the removal of these derogatory entries.
- HSBC Bank USA, N.A., account number 5472048962, the entries marked "30 Days Late" for January 2009 and February 2009 are reported incorrectly. These payments were made on time. I am requesting the removal of these derogatory entries.
- Accurate Account Solutions, account number 53647060279, I do not recognize this account, and do not believe it is mine. I am requesting the removal of this entire trade line.

Please investigate these trade lines and delete or correct (as above) the disputed items as soon as possible.

Regards,



Paul Tatseos

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52-3 DISTRICT COURT  
2014 APR -9 P 2:30



Paul Tatseos  
905 Buckhorn Dr.  
Lake Orion, MI 48362  
Re: Credit Report No. 334061130  
Certified Mail #7012 3050 0000 0788 0919

**P17**

November 12, 2013

Equifax Information Services, LLC  
PO Box 740256  
Atlanta, GA 30374

Dear Sir or Madam:

I am writing to dispute the following trade lines on my credit report:

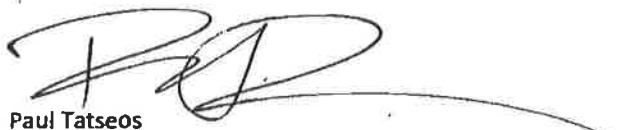
- **EOS CCA**, account numbers 3866888 & 6248707. I do not recognize these accounts, and do not believe they are mine.
- **Capital One**, account number 4003447013470531, the derogatory entries on this account are due to fraudulent activity and are not mine.
- **Charter One**, account number 5240380004080623, the derogatory entries on this account are due to fraudulent activity and are not mine.
- **US Bank**, account number 4190087706438354, the derogatory entries on this account are due to fraudulent activity and are not mine.

Equifax recently received and signed for documentation in which I substantiate and ask for a 7 year fraud alert (copy enclosed), which documents this disputes above related to fraudulent activity.

I am requesting the removal of the entire trade lines under dispute. Please investigate and delete the disputed items as soon as possible.

All calls to all phone numbers at all times are inconvenient. My correct mailing address is as stated above.

Regards,



Paul Tatseos

Enclosures

Copy of letter requesting 7 year fraud alert received by Equifax September 3, 2013

Paul Tatseos  
905 Buckhorn Dr.  
Lake Orion, MI 48362  
Re: Credit Report No. 3323023946  
Certified Mail #7012 3050 0000 0787 6967

**P19 + P25**

December 17, 2013

Equifax Information Services, LLC  
PO Box 740256  
Atlanta, GA 30374

Dear Sir or Madam:

**FIRST**, I am writing to dispute the following trade lines/derogatory items on my credit report:

- **Ally Financial**, account number 045913929530; the derogatory entries on this account are due to fraudulent activity and are not mine.
- **Discover Financial Services**, account number 6011005390577503; the derogatory entries on this account are due to fraudulent activity and are not mine.
- **HSBC Bank**, account number 5472048962; the derogatory entries on this account are due to fraudulent activity and are not mine.
- **Oakland County 52 District**, docket numbers 11C03090GC, 11C02769GC and 9C06199GC; these public records are due to fraudulent activity and are not mine.

Equifax recently received documentation on September 3, 2013 in which I ask for a 7 year fraud alert and which includes an FTC ID Theft affidavit and police report. This documentation substantiates the above disputes. I am requesting the removal of these entire trade lines/public records, or removal of the derogatory entries as appropriate.

**SECOND**, I recently disputed trade lines from **Capital One** account # 4003447013470531, **Charter One** account #5240380004080623, **US Bank** account #4190087706438354 and **Accurate Account Solutions** account #53647060279. I have received your response of "Verified" for these accounts and find the lack of supporting detail to be unsatisfactory. Additionally, both Experian and TransUnion have investigated and deleted these fraudulent accounts from their records. Per FCRA 611 (a)(6)(B)(iii) please, at a minimum, provide me with:

- A description of the procedure used to determine the accuracy and completeness of the information for these trade lines
- Name, address and phone number of anyone contacted during this investigation and used to determine the accuracy and completeness of the information for these trade lines

Regards,



Paul Tatseos

**P 21**

Eija Tatseos  
905 Buckhorn Dr.  
Lake Orion, MI 48362  
Re: Credit Report No. 3254028873  
Certified Mail #7012 3050 0000 0788 0889

October 29, 2013

Equifax Information Services  
P.O. Box 105314  
Atlanta, GA 30348

Dear Sir or Madam:

I am writing to dispute the following trade lines on my credit report:

**HSBC Bank**, partial account number 601138002800xxxx  
**NCA**, partial account number 601138002800xxxx  
**Senex Services**, account number D3071782N1  
**Congress Collection Corp**, account numbers 1337401, 1340451 and 1403279

I do not recognize any of these accounts, and do not believe they are mine.

I am requesting the removal of these trade lines. Please investigate these trade lines and delete the disputed items as soon as possible.

All calls to all phone numbers at all times are inconvenient. My correct mailing address is as stated above.

Regards,

Eija Tatseos



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52-3 DISTRICT COURT  
2014 APR -9 P 2:30

Elja Tatseos  
905 Buckhorn Dr.  
Lake Orion, MI 48362  
Re: Credit Report No. 3309042005  
Certified Mail #7012 3050 0000 0788 0957

**P23 + P26**

December 17, 2013

Equifax Information Services  
P.O. Box 105314  
Atlanta, GA 30348

Dear Sir or Madam:

FIRST, I am writing to dispute these trade lines on my credit report:

- **Credit One Bank**, account # 444796222179xxxx; I do not recognize this account, and do not believe it is mine.
- **Chase Bank USA, NA**, account # 5483109201359787; the derogatory entries on this account are due to fraudulent activity and are not mine.
- **HSBC Bank**, account # 473068012801xxxx; the derogatory entries on this account are due to fraudulent activity and are not mine.
- **Discover Financial Services**, account # 6011005390577503; the derogatory entries on this account are due to fraudulent activity and are not mine.
- **Oakland County S2 District**, docket numbers 09C06199GC, 10C008314GC & 13C00129GC; these public records are due to fraudulent activity and are not mine.

For the above accounts with fraudulent activity, I recently sent letters to the information furnishers, in which I explain and substantiate the fraudulent activity on my account. I can provide copies of these letters, the FTC ID Theft affidavit and the police report upon request.

I am requesting the removal of these trade lines, or the elimination of derogatory entries as appropriate. Please investigate these trade lines and take corrective action as soon as possible.

SECOND, I recently disputed trade lines from **HSBC Bank** account # 601138002800xxxx, **National Credit Adjusters** account # 601138002800XXXX and **Senex Services Corp** account # D30717XXXX. I have received your response of "Verified" for these accounts and find the lack of supporting detail to be unsatisfactory. Per FCRA 611 (a)(6)(B)(iii) please, at a minimum, provide me with:

- A description of the procedure used to determine the accuracy and completeness of the information for these trade lines
- Name, address and phone number of anyone contacted during this investigation and used to determine the accuracy and completeness of the information for these trade lines

All calls to all phone numbers at all times are inconvenient. My correct mailing address is as stated above.

Regards,



Elja Tatseos

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52-3 DISTRICT COURT  
2013 APR 9 P 2:30

Paul Tatseos  
905 Buckhorn Dr.  
Lake Orion, MI 48362  
Re: Credit Report No. 3323023946  
Certified Mail #7012 3050 0000 0787 7070

**P27**

February 4, 2014

Equifax Information Services, LLC  
PO Box 105069  
Atlanta, GA 30348

Dear Sir or Madam:

On December 17, 2013, I sent a letter to you in which I request a "Method of Verification" per my rights under FCRA 611(a)(6) & (7) for several prior disputes. Somehow you appeared to misunderstand this request, and instead resolved my request for each trade line by stating "We verified that this item belongs to you."

*At this time I am well within my rights to take legal action for willful non-compliance under FCRA 616. I prefer for this to be resolved outside of the legal system however, so I will once again ask you to provide a FCRA 611(a)(6) & (7) Method of Verification for the following previously disputed entries:*

- **Capital One** account # 4003447013470531
- **Charter One** account #5240380004080623
- **US Bank** account #4190087706438354
- **Accurate Account Solutions** account #53647060279

...and also for the following trade lines for which you just very recently also "verified":

- **Ally Financial**, account number 045913929530
- **HSBC Bank**, account number 5472048962
- **Oakland County 52 District**, docket numbers 11C02769GC and 9C06199GC

Per FCRA 611(a)(6) & (7) please, at a minimum, provide me with:

- A description of the procedure used to determine the accuracy and completeness of the information for these trade lines
- Name, address and phone number of anyone contacted during this investigation and used to determine the accuracy and completeness of the information for these trade lines

Please also provide copies of any additional documentation that might have been provided by the original source.

Regards,

Paul Tatseos



Eija Tatseos  
905 Buckhorn Dr.  
Lake Orion, MI 48362  
Re: Credit Report No. 3309042005  
Certified Mail #7012 3050 0000 0787 7131

**P28**

February 4, 2014

Equifax Information Services  
P. O. Box 105069  
Atlanta, GA 30348

Dear Sir or Madam:

I recently disputed the following trade lines and entries on my credit report:

- Chase Bank USA account # 5483109201359787
- HSBC Bank Nevada account # 473068012801xxxx
- 52-3 District Court Public Records docket numbers 13C00129GC and 09C06199GC

I have received your response of "Verified" for these accounts and find the lack of supporting detail to be unsatisfactory. Per FCRA 611(a)(6) & (7) please, at a minimum, provide me with:

- A description of the procedure used to determine the accuracy and completeness of the information for these trade lines
- Name, address and phone number of anyone contacted during this investigation and used to determine the accuracy and completeness of the information for these trade lines

All calls to all phone numbers at all times are inconvenient. My correct mailing address is as stated above.

Regards,

Eija Tatseos

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2014 APR -9 P 2:30

## **Exhibit 2 – Proofs of receipt**

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52-3 DISTRICT COURT  
2014 APR -9 P 2:30

**P15**

## COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
  - Attach this card to the back of the mailpiece, or on the front if space permits.

## 1. Article Addressed to:

EQUIFAX  
PO BOX 740256  
ATLANTA, GA 30374

## 2. Article Number

(Transfer from service label)

7012 3050 0000 0788 1695

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

## COMPLETE THIS SECTION ON DELIVERY

## A. Signature

X *Canon*☐ Agent☐ Addressee

## B. Received by (Printed Name)

## C. Date of Delivery

D. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ No

## 3. Service Type

☒ Certified Mail☐ Express Mail☐ Registered☐ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

## 4. Restricted Delivery? (Extra Fee)

☐ Yes
RECEIVED FOR FILING  
52-3 DISTRICT COURT  
APR 9 2014
**P17**

## COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
  - Attach this card to the back of the mailpiece, or on the front if space permits.

## 1. Article Addressed to:

EQUIFAX  
PO BOX 740256  
ATLANTA, GA 30374

## 2. Article Number

(Transfer from service label)

7012 3050 0000 0788 0919

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

## COMPLETE THIS SECTION ON DELIVERY

## A. Signature

X *Canon*☐ Agent☐ Addressee

## B. Received by (Printed Name)

## C. Date of Delivery

11/16/2013

D. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ No

## 3. Service Type

☒ Certified Mail☐ Express Mail☐ Registered☐ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

## 4. Restricted Delivery? (Extra Fee)

☐ Yes

P19 FIRST CLASS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature X <i>[Signature]</i> <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to:</p> <p>EQUIFAX PO BOX 740256 ATLANTA, GA 30374</p>		<p>B. Received by (Printed Name) <i>CANON</i> C. Date of Delivery <i>DEC 22 2013</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
		<p>3. Service Type  <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail  <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.         </p>	
		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
<p>2. Article Number (Transfer from service label)</p>		<p>7012 3050 0000 0787 6967</p>	
PS Form 3811, February 2004		Domestic Return Receipt. 102595-02-M-1540	

P21 FIRST CLASS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature X <i>[Signature]</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to:</p> <p>EQUIFAX PO BOX 105314 ATLANTA, GA 30348</p>		<p>B. Received by (Printed Name) C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
		<p>3. Service Type  <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail  <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.         </p>	
		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
<p>2. Article Number (Transfer from service label)</p>		<p>7012 3050 0000 0788 0889</p>	
PS Form 3811, February 2004		Domestic Return Receipt. 102595-02-M-1540	

<b>P23 + P26</b> PLEASE COMPLETE THIS SECTION Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits.	<b>COMPLETE THIS SECTION ON DELIVERY</b> A. Signature X <i>[Signature]</i> <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee B. Received by (Printed Name) <i>DEC 2 2013</i> <i>Canon</i> C. Date of Delivery D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No 3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D. 4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes
1. Article Addressed to: EQUIFAX PO BOX 105314 ATLANTA, GA 30348	
2. Article Number (Transfer from service label) 7012 3050 0000 0788 0957	

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

<b>P27</b> PLEASE COMPLETE THIS SECTION Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits.	<b>COMPLETE THIS SECTION ON DELIVERY</b> A. Signature X <i>[Signature]</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee B. Received by (Printed Name) C. Date of Delivery 2/12/14 D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No 3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D. 4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes
1. Article Addressed to: EQUIFAX PO BOX 105069 ATLANTA, GA 30348	
2. Article Number (Transfer from service label) 7012 3050 0000 0787 7070	

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540



<p><b>COMPLETE THIS SECTION</b></p> <p>Items 1, 2, and 3. Also complete if Restricted Delivery is desired. Write your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to:</p> <p>EQUIFAX PO Box 105069 ATLANTA, GA 30348</p>		<p><b>COMPLETE THIS SECTION ON DELIVERY</b></p> <p>A. Signature X <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) C. Date of Delivery FEB 08 2014</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below.</p>	
<p>2. Article Number (Transfer from service label) 7012 3050 0000 0787 7131</p>		<p>3. Service Type  <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail  <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.         </p>	
<p>PS Form 3811 February 2004 Domestic Return Receipt</p>		<p>102595-02-M-1540</p>	

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